Harmon Environmental, PA

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May 3, 2016

Ms. Carolyn Minnich
Brownfields Project Manager
Division of Waste Management
North Carolina Department of Environmental Quality
1646 Mail Service Center
Raleigh, North Carolina 27699-1646

Re: ***Work Plan for Requested Additional Assessment Activities***
Former Reliable Buff Facility
226 N. Bivens Road, Monroe, North Carolina
Brownfields Project No. 19082-15-090
Project No. 758-02

Dear Ms. Minnich:

Harmon Environmental, PA on behalf of Bloom Industrial, LLC respectfully submits for your review and approval this Work Plan to conduct additional assessment activities at the Former Reliable Buff facility located at 226 N. Bivens Road in Monroe, North Carolina. This Work Plan has been prepared to address the data gaps identified in your April 18, 2016 *Request for Additional Assessment* Letter. Figure 1 depicts the location of the site on an excerpt of a United States Geologic Survey (USGS) 7.5 minute quadrangle topographic map of the region. The latitude and longitude of the site is approximately N34.985847, W80.485428.

Brief Facility History

Based on available information, Harmon Environmental, PA understands the site was initially developed by Reliable Buff in 1986. Reliable Buff was the sole occupant of the property from 1986 when the building was construction to 2010 when the business was sold. During this tenure, Reliable Buff reportedly manufactured buffing disks and pads.

On December 20, 2013, Harmon Environmental, PA personnel visited the site on behalf of a potential purchaser. This Phase 1 assessment was terminated and no report generated. During this visit, approximately 17 empty and partially filled 55-gallon drums and numerous empty 55-gallon drums were observed in the southeast corner of the building. These drums appeared to be reused with many of the labels obscured by stains and spillage. One partially filled drum observed during this site visit had a hand written label identifying the contents as tetrachloroethene.

On December 23, 2013, Harmon Environmental, PA interviewed Mr. Frank Cincotta by telephone. Mr. Cincotta indicated that he had been the president of Reliable Buff until 2010 when the business was sold to a gentleman in California. Mr. Cincotta indicated that Reliable Buff manufactured

cotton based buffing pads. The cotton material was reportedly dipped into resin tanks and then spun dry. Mr. Cincotta indicated that approximately 90% of the material used in this process was water based. The remaining pads were dipped in tetrachloroethene based resin. Mr. Cincotta indicated that due to evaporation, no waste tetrachloroethene was generated from the site. Mr. Cincotta indicated the site was never registered with the State of North Carolina as a hazardous waste generator or disposer.

Based on this interview with Mr. Cincotta, Harmon Environmental, PA understands that Reliable Buff operated a drying room constructed from a shipping container in the yard area immediately east of the facility. The shipping container was equipped with fans used to dry the water-based resin soaked pads. The fans were reportedly shaft driven by a motor located within the manufacturing building. The drive shaft reportedly passed through the metal plate depicted in Photo 6 of the May 5, 2014 *Limited Environmental Site Assessment - Transaction Screening Report* prepared by CBRE, Inc. of Houston Texas. The staining/coating of the concrete and gravel adjacent to the building in this portion of the site was suggested to have resulted from transferring the wet pads to the shipping container.

Based on information presented in the CBRE Inc. May 5, 2014 *Limited Environmental Site Assessment - Transaction Screening Report* the drums were apparently removed from the site prior to their site visit.

Proposed Assessment Activities

To comply with Item 1a. of the April 18, 2016 letter, Harmon Environmental, PA proposes to retain Geologic Exploration, Inc., to advance three Type II monitor wells at the approximate locations depicted on Figure 3. These three wells will each be advanced using air rotary drilling technology to a maximum depth of up to 40 feet below grade. As advanced, drill cuttings will be contained on plastic sheeting pending collection and analysis characterizations samples for disposal. Following advancement of each boring, the monitor wells will be constructed of 2-inch diameter Schedule 40 flush threaded PVC casing and manufactured screen. The screen length for each well will be determined in the field in an effort to intercept the water table surface. The monitor wells will each be constructed in accordance with North Carolina Administrative Code, Title 15A, Subchapter 2C (15A NCAC 2C) and finished with manhole type flush covers.

Following construction of the wells, each well will be developed to the fullest extent practicable. The development water will be contained in labeled 55-gallon drums on site for subsequent sampling for appropriate disposal.

After allowing each well sufficient time to equilibrate, the water levels will be measured using an electronic depth to water indicator. Following collection of the water level measurements, the wells will be purged of three well volumes or until dry and sampled with disposal bailers in general

accordance with DEQ accepted protocol. Each sample will be contained in glassware provided by the analyzing laboratory and stored on ice pending delivery to the laboratory for analysis. Chain-of-Custody protocol will be maintained throughout the sample delivery process. Upon receipt, the groundwater samples will be analyzed for: Volatile Organic Compounds (VOCs) in accordance with SW-846 Method 8260B; Semi-Volatile Organic Compounds (Semi-VOCs) in accordance with SW-8467 Method 8270D (BN/A) and; Antimony, Arsenic, Beryllium, Cadmium, Total Chromium, Copper, Lead, Manganese, Mercury, Nickel, Selenium, Silver, Thallium and Zinc by ICP methods. The analytical results will include a Level 2 QA/QC data package.

Purge water collected during the sampling process will be contained with the development water on site in a 55-gallon drum for subsequent sampling for appropriate disposal.

Following collection of the groundwater samples, the locations of each of the monitor wells will be measured relative to on-site structures and the top of casing elevation will be measured for each well relative to an arbitrary on-site benchmark.

In addition to advancing and sampling the three monitor wells, to comply with Item 1b. of the April 14, 2016 letter, Harmon Environmental, PA proposes to collected a soil sample from the approximate location depicted on Figure 3. This sample will be collected using hand auger technology from a depth of 0-2 feet below grade. As collected a representative aliquot of the sample will be contained in a zipper sealed bag for visual description and field screening using a Multi-Rae® Photoionizing Detector calibrated to an isobutylene standard. A second aliquot will be placed into glassware provided by the analyzing laboratory and stored in a cooler on ice pending delivery to the analyzing laboratory. Chain-of-Custody protocol will be maintained throughout the sample delivery process. Upon receipt, this soil sample will be analyzed for: VOCs in accordance with SW-846 Method 8260B; Semi-VOCs in accordance with SW-8467 Method 8270D (BN/A); Antimony, Arsenic, Beryllium, Cadmium, Total Chromium, Copper, Lead, Manganese, Mercury, Nickel, Selenium, Silver, Thallium and Zinc by ICP methods and; Hexavalent Chromium by SW-846 Method 7196A. The analytical results will include a Level 2 QA/QC data package.

Following collection of the soil sample, the boring location will be measured relative to on site structures. The boring will be backfilled with bentonite clay. Cuttings generated in the boring advancement process will be incorporated into the stockpile generate during the well advancement for subsequent sampling and appropriate disposal.

To comply with Item 2. of the April 14, 2016 letter, Harmon Environmental, PA personnel will conduct a *Brownfields Receptor Survey* for the subject facility. The results of this survey will be incorporated into the Report prepared as a result of these assessment activities.

To comply with Item 3. of the April 14, 2016 letter, upon receipt of the analytical data, Harmon Environmental, PA will prepare a brief report summarizing the methods and results of these

additional assessment activities. This report will include tabulated results compared to applicable screening levels, laboratory data packages and figures depicting the sample locations, the monitor well locations, the calculated groundwater flow direction and gradient and concentration contour maps for detected constituents, if applicable.

Proposed Schedule

Harmon Environmental, PA is prepared to initiated these assessment activities upon receipt of your approval. The *Brownfields Receptor Survey* will be initiated immediately. Based on contractor availability, drilling and monitor well installation activities are tentatively scheduled for June 6, 2016. Assuming normal laboratory turn-around, the analytical data is anticipated by June 24, 2016. Based on this schedule, the final report can be submitted by July 8, 2016.

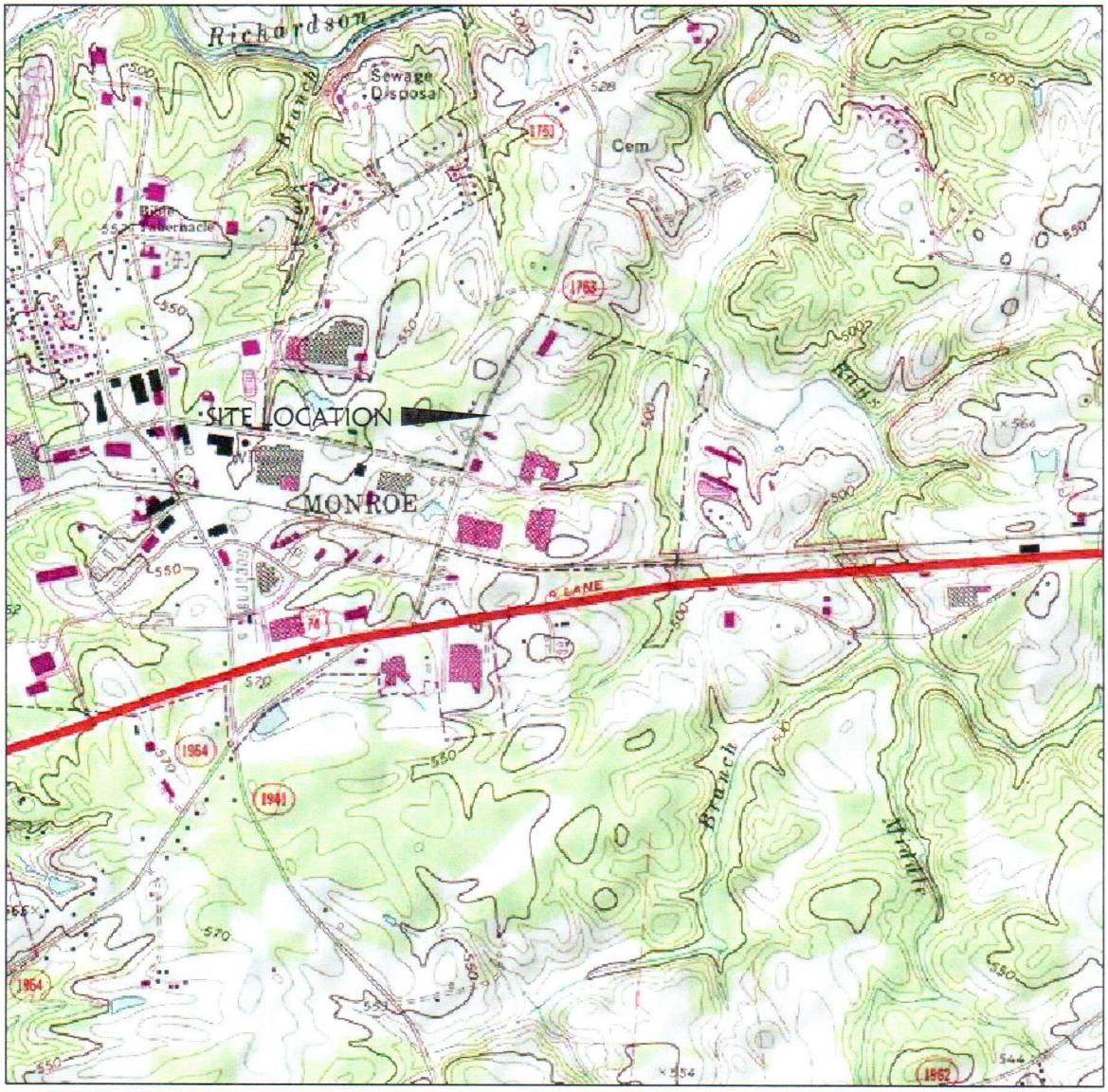
Please review this work plan and call or email if you have any questions. Upon receipt of your approval, Harmon Environmental, PA will initiate these assessment activities.

Sincerely,
Harmon Environmental, PA

Richard L. Harmon, P.G.
President/Principal Hydrogeologist

Attachments

Figures



SOURCE: TOPO! 2003 NATIONAL GEOGRAPHIC

APPROXIMATE SCALE IN FEET

0 2000 4000

HARMON ENVIRONMENTAL, PA
615 BRUCE THOMAS ROAD
MONROE, NORTH CAROLINA
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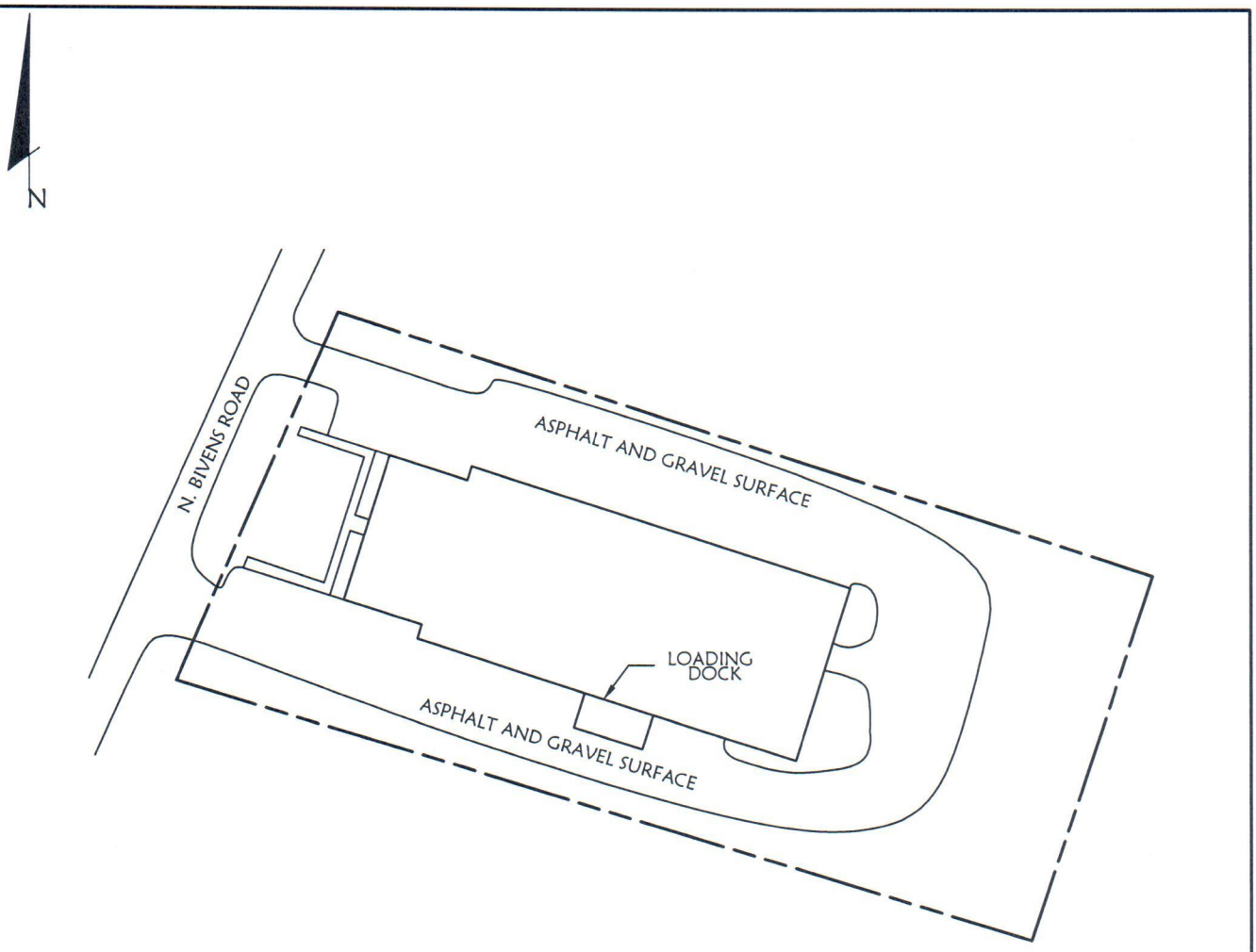
FIGURE 1
SITE LOCATION MAP
FORMER RELABLE BUFF
226 N. BIVENS ROAD
MONROE, NORTH CAROLINA

758-02FIG1.DWG



LEGEND

APPROXIMATE LOCATION OF PROPERTY BOUNDARIES

APPROXIMATE LOCATION OF RESIDENCES

APPROXIMATE LOCATION OF PAVED AND GRAVEL SURFACES

APPROXIMATE SCALE IN FEET

0 100 200

SOURCE: UNION COUNTY GIS AND FIELD MEASUREMENTS

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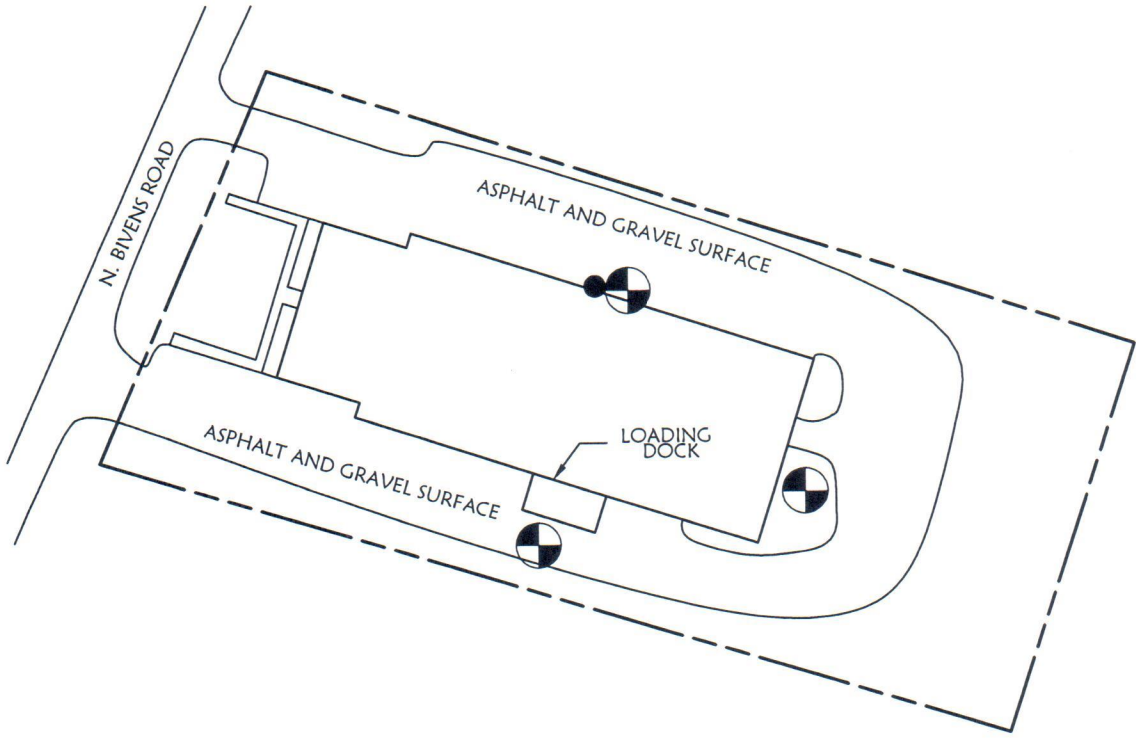
FIGURE 2
SITE LAYOUT MAP
FORMER RELIABLE BUFF
226 N. BIVENS ROAD
MONROE, NORTH CAROLINA

758-02FIG2.DWG



LEGEND

- APPROXIMATE LOCATION OF PROPERTY BOUNDARIES
- APPROXIMATE LOCATION OF RESIDENCES
- APPROXIMATE LOCATION OF PAVED AND GRAVEL SURFACES
- APPROXIMATE LOCATION OF PROPOSED TYPE II MONITOR WELL
- APPROXIMATE LOCATION OF PROPOSED SHALLOW SOIL SAMPLE

APPROXIMATE SCALE IN FEET

0 100 200

SOURCE: UNION COUNTY GIS AND FIELD MEASUREMENTS

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FIGURE 3
SITE LAYOUT MAP WITH PROPOSED SAMPLE LOCATIONS
FORMER RELIABLE BUFF
226 N. BIVENS ROAD
MONROE, NORTH CAROLINA

758-02FIG3.DWG